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11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 Paul Santiago,

14 Petitioner,

15 v.

16 State of Nevada,

17 Respondent.

Case No. 2:21-cv-00896-APG-NJK

**Unopposed motion for extension of  
time in which to file Opposition to  
Motion to Dismiss**

**(Second request)**

18 Petitioner Paul Santiago respectfully moves this Court for an extension of time  
19 of 45 days, from April 11, 2023, to and including May 26, 2023, in which to file an  
20 Opposition to the Motion to Dismiss.  
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POINTS AND AUTHORITIES

Mr. Santiago filed a *pro se* petition for writ of habeas corpus on or about May 4, 2021.<sup>1</sup> Counsel filed a First Amended Protective Petition on August 18, 2021.<sup>2</sup> Counsel simultaneously sought leave to file a Second Amended Petition, which the Court granted.<sup>3</sup> Mr. Santiago filed his Second Amended Petition on July 13, 2022.<sup>4</sup> Respondents filed their Motion to Dismiss on January 27, 2023.<sup>5</sup> Mr. Santiago now respectfully requests an extension of time of 45 days to file the Opposition to the Motion to Dismiss. This is the second request for an extension of time. The additional period of time is necessary in order to effectively represent Mr. Santiago. This motion is filed in the interests of justice and not for the purpose of unnecessary delay.

Undersigned counsel respectfully requests additional time to prepare the Reply. Since the previous extension request, counsel has had additional case obligations including filing a state court Reply in *Moncada v. State*, CR7914 and CR7920; drafting a Reply in *Patterson v. Johnson*, 2:20-cv-01614-JAD-DJA; and drafting an Amended Petition in *Lopez v. Johnson*, 2:20-cv-01496-RFB-VCF. Counsel has also commenced duty attorney obligations for the Federal Public Defender's office, which involves representing clients in initial appearances and detention hearings in federal court. As such, counsel observed initial and detention hearings on February 22, 2023, and represented clients in the same on February 24, 2023. Additionally, counsel appeared in state court in *Shue v. State*, C-13-288172-1 and *White v. State*, A-22-859004-W. Furthermore, counsel has been actively working with experts in *Mullner v. Williams*, 2:20-cv-00535-JAD-BNW, *Pineda v. Gittere*, 3:18-cv-

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<sup>1</sup> ECF No. 1-1 at 1

<sup>2</sup> ECF No. 11.

<sup>3</sup> ECF No. 13.

<sup>4</sup> ECF No. 27.

<sup>5</sup> ECF No. 67.

00592-LRH-EJY, *Lopez v. Johnson*, 2:20-cv-01496-RFB-VCF, and *Langford v. Baker*, 3:19-cv-00594-MMD-CSD. Counsel also traveled to Portland for a mandatory training conference from March 1-4, 2023.

On April 10, 2023, counsel for Respondents, Deputy Attorney General Adam Woodrum, indicated by email that Respondents do not oppose this request with the understanding that Respondents' lack of objection is not a waiver of any procedural defenses.

For the above stated reasons, Mr. Santiago respectfully requests this Court grant an extension of time of 45 days and order the Opposition to the Motion to Dismiss to be filed on or before May 26, 2023.

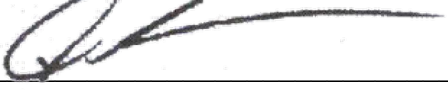
Dated April 11, 2023.

Respectfully submitted,

Rene L. Valladares  
Federal Public Defender

/s/ Laura Barrera  
Laura Barrera  
Assistant Federal Public Defender

IT IS SO ORDERED:

  
United States District Judge

Dated: April 11, 2023